

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. NO. 01-34

REQUEST: Verizon Massachusetts' Information Requests to WorldCom, Inc.

DATE: February 14, 2002

VZ-WCOM 2-3: On page 4 of the Direct Testimony of Karen K. Furbish, it states that "a review of billing records from Verizon for the month of August 2001 indicates WorldCom pays monthly charges for a small number of intrastate special access circuits." Please provide the Massachusetts bill relied upon in support of that statement and indicate the order numbers and circuit identifier (ID) numbers for each of the intrastate circuits to which Ms. Furbish refers.

Respondent: Karen K. Furbish

RESPONSE: The attached spreadsheet lists intrastate Special Access circuits WorldCom has purchased from Verizon pursuant to Tariff DTE MA No. 15 and for which WorldCom continues to pay monthly charges. With the exception of two columns, the information contained in the attachment was derived from the electronic monthly billing data received from Verizon and contained in its Carrier Access Billing System. The two columns on the spreadsheet not derived directly from a Verizon electronic bill to WorldCom are: (1) column A, "LEC Order #," which WorldCom obtained by cross-referencing data on Verizon's bill with an internal WorldCom database, and (2) column H, "USOC Description," which simply identifies the nature of each line-item charge associated with Tariff DTE MA No. 15 for which WorldCom is being billed (*i.e.*, mileage, variable mileage or channel termination (CT)).

Please note that this spreadsheet contains the list of circuits WorldCom has been able to identify with some certainty as having been purchased pursuant to Tariff DTE MA No. 15; the electronic bills WorldCom receives from Verizon list additional circuits located in Massachusetts that may also have been purchased out of Tariff DTE MA No. 15, but because of possible errors in the associated USOCs listed on the bill, WorldCom has not confirmed which tariff these circuits are associated with.

Finally, although my testimony refers to the billing records for the month of August 2001, the billing records to which I was actually referring were

dated September 25, 2001; these are the same records used to generate the attachment hereto.

WorldCom considers this attachment to be proprietary and confidential and will provide it to parties subject to the terms of a mutually acceptable Protective Agreement.